

Lucio Celli  
2743 Seymour Avenue  
Bronx, New York  
646-734-3988  
enzo0mad@aol.com

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2018 MAR 27 PM 8:52

U.S. DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

ELIZABETH "BETSY" COMBIER,  
Plaintiff,

Case No.: 17-cv-02239(MB)(RLM)

vs.

FRANCESCO PORTELOS, LUCIO CELLI, BRYAN  
GLASS, ESQ. JORDAN HARLOW, ESQ. NEW YORK  
DEPARTMENT OF EDUCATION, AND CARMEN  
FARINA (THE CHANCELLOR FOR THE NYC DOE),  
ALL SUED INDIVIDUALLY AND OFFICALLY,

Defendants

LETTER TO HON. BRODIE ABOUT MUARA KING, ESQ  
TO REMIND HER THAT LUCIO AUDIO RECORDS HIS  
PHONE CONVERSATIONS AND TO VERIFY BETSY'S  
LIES IN A LETTER DATED MARCH 26, 2018—IF BETSY  
LIED, LUCIO BELIEVES PLAINTIFF SHOULD BE  
SANCTIONED UNDER **PERJURY UNDER: FALSE  
STATEMENTS (18 U.S.C. 1001)**

Lucio Celli, one of the named defendants and hereafter "Lucio," files this letter because of Elizabeth Combiér (hereafter "Betsy") has accused Lucio of lying without any proof or affidavit to the Court. However, an affidavit from Betsy or David Kapel is worthless. Lucio called Maura King, Esq. because according to Betsy, Lucio lied about what Ms. King told him.

**Please Take Notice**, NYS FOIL requires each agency to maintain a "subject matters list."

**Please Take Notice**, logins and logins to paid website by CUNY is on "subject matters list." **See Exhibit A**. Lucio is only providing the court with the first page of the document and the email because the attachment is a 181-page document and, unlike Betsy, Lucio does not believe in killing trees.

**Please Take Notice**, Ms. King told Lucio "even though logins from staff are available and is part of CUNY's subject matter list, she could not release David Kapel's logins because of a possible investigation"

LETTER TO HON. BRODIE ABOUT MUARA KING, ESQ TO REMIND HER THAT LUCIO AUDIO RECORDS HIS PHONE CONVERSATIONS AND TO VERIFY BETSY'S LIES IN A LETTER DATED MARCH 26, 2018—IF BETSY LIED, LUCIO BELIEVES PLAINTIFF SHOULD BE SANCTIONED UNDER PERJURY UNDER: FALSE STATEMENTS (18 U.S.C. 1001) - 1

1 It **IS NOT** possible for Ms. King to say one thing to Betsy and tell Lucio, she could not  
 2 release David Kapel's logins because of an investigation, as it is the policy of CUNY and part of  
 3 their "subject matters list" to do otherwise.

4  
 5  
 6 Lucio is waiting for Ms. King to either call or email him back. **However**, Lucio is certain  
 7 that Betsy is a liar because Ms. King would not violate CUNY's policy found in the "subject  
 8 matters list for FOIL" for Betsy and David Kapel. Lucio does not understand what Your Honor  
 9 is waiting to sanction Betsy for being a liar because Your Honor could do it *sua sponte*.

10 **In the meantime**, Lucio will submit FOIL requests of all emails, phone calls, and  
 11 whatever else is available under the "subject matters list" from Betsy to Ms. King because this is  
 12 the only way to prove Betsy is a liar.

#### 13 14 Conclusion

15 Lucio keeps on begging the Court to address Betsy's misconduct of lying, which is being  
 16 done knowingly too. **Example of Betsy being a liar**, Betsy submitted evidence that Lucio hired  
 17 the plaintiff on page 177 and in Doc. No. 67. But, wrote a whole complaint of a scheme that  
 18 Lucio paid Betsy as gift—**Is Betsy crazy or just a liar?**

19 Even Betsy's own sister (Jill Danger), the sister believes that Betsy is a liar and killed  
 20 their mother. The email presented to the court already, Jill Danger believes that Betsy's mental  
 21 illness is due to Betsy's disability and Betsy not being as smart Jill. **In fact**, Jill Danger informs  
 22 everyone that Betsy is miserable without friends because Betsy has allowed her shortcomings to  
 23 affect her relationships.

24 Then, Betsy accused federal judges of "stealing" her mother's ashes—this is shows  
 25 someone who is not stable and mentally ill.

#### 26 Perjury Under: False Statements (18 U.S.C. 1001)

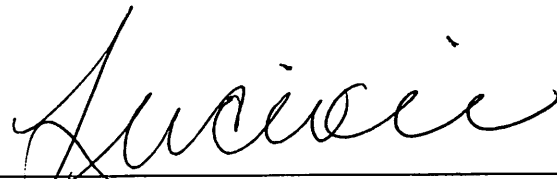
27 LETTER TO HON. BRODIE ABOUT MUARA KING, ESQ TO REMIND HER THAT LUCIO AUDIO  
 28 RECORDS HIS PHONE CONVERSATIONS AND TO VERIFY BETSY'S LIES IN A LETTER DATED  
 MARCH 26, 2018—IF BETSY LIED, LUCIO BELIEVES PLAINTIFF SHOULD BE SANCTIONED UNDER  
 PERJURY UNDER: FALSE STATEMENTS (18 U.S.C. 1001) - 2

1 Lucio moves the court to consider sanctioning Betsy and her husband for knowingly  
2 submitting false documents, as affidavits because their lies to the court are not supported by  
3 Lucio's FOIL answers from Hunter College FOIL Unit. Betsy wants the Court to believe that the  
4 plaintiff does not understand Lucio's counterclaims and defense claims but submitted an affidavit  
5 with pure lies. Betsy's and her husband's affidavit attempts to conceal and cover-up their  
6 misconduct because they are stealing from the State of New York, **WHICH** is the reason David  
7 Kapel is being investigated by Hunter College.

8 **Perjury Under: False Statements (18 U.S.C. 1001)**

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13 with pure lies. Betsy's and her husband's affidavit attempts to conceal and cover-up their  
14 misconduct because they are stealing from the State of New York, **WHICH** is the reason David  
15 Kapel is being investigated by Hunter College.

16 Dated this 27 of March 2018.

17 

18 Lucio Celli, pro se

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PERJURY UNDER: FALSE STATEMENTS (18 U.S.C. 1001) - 3

# Exhibit A

LETTER TO HON. BRODIE ABOUT MUARA KING, ESQ TO REMIND HER THAT LUCIO AUDIO RECORDS HIS PHONE CONVERSATIONS AND TO VERIFY BETSY'S LIES IN A LETTER DATED MARCH 26, 2018—IF BETSY LIED, LUCIO BELIEVES PLAINTIFF SHOULD BE SANCTIONED UNDER PERJURY UNDER: FALSE STATEMENTS (18 U.S.C. 1001) - 4

**From:** Maura King  
**Sent:** Tuesday, February 13, 2018 10:34 AM  
**To:** [enzo0mad@aol.com](mailto:enzo0mad@aol.com)  
**Subject:** Foil Response

Good Morning

This is in response to your request for records.

FOIL applies to existing records and does not require agencies to create new records in response to requests for information.

Attached are the documents which are responsive to your request.

Regards,

Maura A. King  
Office of Legal Affairs  
Hunter College

<subjectmatterslistfoil.pdf>  
<Scan 10.jpeg>

*1st Page of Subject Matters*  
*1st FOIL*

THE CITY UNIVERSITY OF NEW YORK: OFFICE OF THE CHANCELLOR - ACCOUNTING		
Item Code	Record Series Title	Subject Matter
PRA-1	Policy Documents	Involving major procedures, policies, or standards affecting College or University operations, critical functions, or issues of public visibility or concern
PRA-2	Correspondence/ Subject Files-- Significant Content	Correspondence, memoranda, reports, and other records dealing with significant subjects, events, policy decisions, program development
PRA-3	Correspondence/ Subject Files-- Routine Content	Correspondence, memoranda, reports, and other records dealing with routine administrative matters
PRA-4	Correspondence/ Subject Files-- Other Content	Correspondence, memoranda, reports, and other records which have no fiscal, legal, or administrative value
PRA-5	Freedom of Information Request Files	Request for access to public records and response, when request is granted  Request for access to public records, when request is denied, including statement of denial, appeal records, documentation of review and decision

*181-Page doc*

This Schedule lists ONLY records whose OFFICIAL copies are kept in your department. DUPLICATE copies of records whose official copies are kept elsewhere are not listed. DUPLICATE copies should be destroyed as soon as no longer needed.